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**UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING**

STATE OF WYOMING et al.)	
)	
Petitioners,)	
)	Civil Case No. 2:16-cv-00285-SWS [Lead]
v.)	
)	[Consolidated With 2:16-cv-00280-SWS]
UNITED STATES DEPARTMENT OF)	
THE INTERIOR, et al.)	Assigned: Hon. Scott W. Skavdahl
)	
Respondents,)	CITIZEN GROUPS' MOTION TO
)	INTERVENE AS RESPONDENTS
and)	
)	
WYOMING OUTDOOR COUNCIL,)	
CENTER FOR BIOLOGICAL)	
DIVERSITY, CITIZENS FOR A)	
HEALTHY COMMUNITY, DINÉ)	
CITIZENS AGAINST RUINING OUR)	
ENVIRONMENT, ENVIRONMENTAL)	
DEFENSE FUND, ENVIRONMENTAL)	
LAW AND POLICY CENTER,)	
MONTANA ENVIRONMENTAL)	
INFORMATION CENTER, NATIONAL)	
WILDLIFE FEDERATION, NATURAL)	
RESOURCES DEFENSE COUNCIL, SAN)	
JUAN CITIZENS ALLIANCE, SIERRA)	
CLUB, THE WILDERNESS SOCIETY,)	
WESTERN ORGANIZATION OF)	
RESOURCE COUNCILS, WILDERNESS)	
WORKSHOP, AND WILDEARTH)	
GUARDIANS.)	
)	
Applicants for Intervention.)	

Pursuant to Federal Rule of Civil Procedure 24, Wyoming Outdoor Council, Center for Biological Diversity, Citizens for a Healthy Community, Diné Citizens Against Ruining the Environment, Environmental Defense Fund, Environmental Law and Policy Center, Montana Environmental Information Center, National Wildlife Federation, Natural Resources Defense Council, San Juan Citizens Alliance, Sierra Club, The Wilderness Society, Western Organization of Resource Councils, Wilderness Workshop, and WildEarth Guardians (collectively, the Citizen Groups) respectfully move to intervene in the above-captioned matter as Respondents as of right or, in the alternative, permissively.¹ Intervention is necessary because Plaintiffs seek relief that would harm the Citizen Groups' interests by eliminating important conservation, environmental, and health and safety protections on public lands.

Counsel for the Citizen Groups have conferred with counsel for the Respondents U.S. Department of the Interior et al., who take no position on the Motion. Petitioners Western Energy Alliance, Independent Petroleum Association of America, and the State of Wyoming also take no position. The State of Montana does not oppose the Motion. The State of North Dakota did not respond to multiple emails and phone calls.

This case involves the legality of the Bureau of Land Management's recently-promulgated waste prevention, production subject to royalties, and resource conservation rule. Petitioners seek to invalidate the Rule. As discussed in the attached memorandum, the Citizen Groups seek intervention to preserve the important conservation, environmental, and health and safety benefits that the Rule provides their members.

¹ Pursuant to Local Rule 83.6, the Citizen Groups are not filing a proposed answer. *See* U.S.D.C.L.R. 83.6(b) (no answer required in cases involving review of agency action).

Respectfully submitted on December 2, 2016,

/s/ Lisa McGee
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CERTIFICATE OF SERVICE

I certify that on December 2, 2016, I filed a true and correct copy of **CITIZEN GROUPS' MOTION TO INTERVENE AS RESPONDENTS** via the court's ECF system.

/s/ Lisa McGee

Lisa McGee

Attorney for Proposed Respondent-Intervenors